

REMARKS

In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the subject application. This amendment is believed to be fully responsive to all issues raised in the Office Action mailed
5 April 14, 2005.

Rejections Under 35 U.S.C. §103

Claims 1-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,343,324 to Hubis (hereinafter, "the '324
10 patent") in view of U.S. Patent No. 6,374,336 to Peters (hereinafter, "the '336 patent"). Applicants traverse the rejections.

Claim 1

Claim 1 stands rejected over the '324 patent in combination with the
15 '336 patent. Applicants traverse this rejection, and assert that the final Action fails to establish a *prima facie* case of obviousness.

To establish a *prima facie* case of obviousness, the Action must establish that each element of the claim is disclosed or suggested by the cited references. See, MPEP 2142. Claim 1 recites a limitation directed to
20 *requesting access to the resources by sending identifying indicia from the storage resource user to the resource provider, in response to receiving the notification.* The final Action appears to assert that the '324 patent discloses the claimed subject matter, and cites column 10, line 64 through column 13, line 67 to support the rejection.

Applicants disagree that the cited text discloses or suggests
*requesting access to the resources by sending identifying indicia from the
storage resource user to the resource provider, in response to receiving the
notification*, as recited in claim 1. To the contrary, nothing in the '324 patent
5 discloses or suggests that that access requests from a storage resource
user are generated in response to the receiving a notification, as recited in
claim 1. Absent such a disclosure or suggestion in the cited references, the
Action fails to establish a *prima facie* case of obviousness.

10 Claims 2, 12, 19

Claims 2, 12, and 19 appear to stand rejected over the '324 patent in
combination with the '336 patent. Applicants traverse this rejection, and
assert that the Action fails to establish a *prima facie* case of obviousness.

Claim 2 recites a limitation directed to *storing identifying indicia in a
15 table of not-yet-approved entities if the resources are not available to the
requesting storage resource user*. The first Action appeared to assert that
the '324 patent discloses the claimed subject matter, and cited column 10,
line 64 through column 13, line 67 to support the rejection. The final Action
maintained the rejection, but cited column 12, lines 36-68 to support the
20 rejection. Applicants disagree. The cited text reads as follows:

25 The Volume Permission Table 194, is generated as the
search proceeds and is kept as a part of the Port Mapping
Table 190. The Volume Permission Table 194 includes a
Permission Indicator 195 that indicates whether the particular
host with HI has permission to access data on the logical
volume. These VPT 194 are also illustrated in FIG. 2b and
identify which host (based on the Host Index 151) have
permission to access and which do not.

5 As the search of the Volume WWN Tables 130 proceed,
the Volume Permission Table 194 entry for the particular host
(as identified by that host's HI) will be set to either "true" (equal
to 1) or "false" (equal to 0) depending on the outcome of the
search. For example, if the Volume WWN Table 130 search
10 identifies that a host should be allowed access to a particular
logical volume (when that host's WWN appears in the Volume
WWN Table 130 associated with that volume), the Volume
Permission Table 194 entry (Permission Flag 195) for that host
(as identified by the HI) will be set to "true" or "1", indicating
that the host has access to that logical volume. On the other
hand, if the query identifies that the host's WWN does not
appear, the Volume Permission Table 194 entry (Permission
Flag 195) for that host (as identified by the HI) will be set to
15 "false" or "0".

20 When the host computer 101 attempts to read or write a
logical volume 108, the HI 151 for the requesting host is
determined by controller 106 based on that host's Fibre channel
Loop ID 152 which is returned by the Fibre channel I/O
processor 184 along with detailed information that fully defines
the operation, including the LUN to which the read or write
request is addressed. If the request is not a Vendor Unique
25 command (which might indicate an attempt to configure or
reconfigure a volume and require special handling), the array
controller 106 examines the Volume Permission Table 194 for
that HI and for that logical volume. If the permission indicator
associated with that HI is true ("1"), the request is executed
normally. That is, the read, write, or other access request is
30 executed using the normal procedure for reading or writing
data to or from the logical volume. On the other hand, if the
permission indicator associated with that HI and for the logical
volume to which the request is addressed is false ("0"), then
the read or write command is rejected back to the host
35 computer from which it was sent with an error condition.

Contrary to the assertion in the final Action, the cited text of the '324
patent neither discloses nor suggests *storing identifying indicia in a table of
not-yet-approved entities if the resources are not available to the requesting
40 storage resource user*, as recited in claim 2. To the contrary, at most the
'334 text discloses recording a "0" in the Volume Permission Table 194 when
resources are not available to the requesting storage user. The "0" recorded
in the Volume Permission Table 194 is not an *identifying indicia*, as recited in

claim 2. Thus, the '324 patent, alone or in combination with the '336 patent, fails to disclose elements recited in claim 2. Accordingly, the final Action fails to establish a *prima facie* case of obviousness.

Independent claim 12 recites a limitation directed to *storing, in a table*
5 *of not-yet-approved entities in volatile memory in the controller, indicia of any of the at least one storage resource user that have not been granted access to data storage areas on disks in the storage array.* The final Action fails to establish a *prima facie* case of obviousness of claim 12 for the same reasons applied to claim 2.

10 Independent claim 19 recites limitations directed to a first table of approved entities for storing indicia of data storage areas and the storage resource user to which the areas are accessible, and a second table of non-approved entities for storing indicia identifying storage resource user entities that are not presently allowed access to any resources on the storage area
15 network. The final Action fails to establish a *prima facie* case of obviousness of claim 19 for the same reasons applied to claim 2.

Claims 8 and 15

Dependent claims 8 and 15 recite limitations directed to uploading
20 available resources and not-yet-approved entities to a management station, selecting a user identity and set of resources to be made available to the user, sending a list of selected resources to the resource provider, and allocating to the user the resources included in the list. The final Action asserts that the '324 patent discloses these limitations and appears to cite

column 21, lines 20-65, to support the rejection. The cited text reads as follows:

5 By way of example but not limitation, the inventive structure and method support a variety of different multiple host configurations, including Multiple HBAs in the same NT host, Multiple NT hosts, Multiple HBAs in the same IRIX host, and Multiple hosts having mixed operating systems (for example, IRIX and NT).

10 The inventive structure and method may also be used in an Internet configuration or with any interconnected network of host computer systems and/or devices such as wide area networks (WANs) and storage area networks (SANs). While the external communication net increases in speed, the
15 storage area network speed stays about 10 times faster. Furthermore, while we describe a structure and method that is based upon the WWN of a fiber channel device, other unique identifiers may be used, for example the serial number that is imbedded in certain host computer processor chips, such as
20 the Intel Pentium III microprocessor chips. These and other identifiers may alternatively be used. As the bandwidth of external nets (WANs) becomes comparable to the storage area nets (SANs), the structures, procedures, and methods described here may be implemented for distributed storage on
25 the Internet or on other interconnected networks of host computers, storage devices, information appliances, and the like, much in the manner that web pages on the Internet are distributed and linked.

30 Further, the method and system described herein above is amenable for execution on various types of executable mediums including a memory device and other mediums different than a memory device such as a random access memory. Other types of executable mediums can be used,
35 such as but not limited to, a computer readable storage medium which can be any memory device, compact disc, hard magnetic disk, ROM, RAM, CR-ROM disc, DVD, optical media, magneto-optical media, or floppy disk.

40 The foregoing description, for purposes of explanation, used specific nomenclature to provide a thorough understanding of the invention. However, it will be apparent to one skilled in the art that the specific details are not required in order to practice the invention. In other instances, well known
45 circuits and devices are shown in block diagram form in order to avoid unnecessary distraction from the underlying invention. Thus, the foregoing descriptions of specific embodiments of the present invention are presented for purposes of illustration and

description. They are not intended to be exhaustive or to limit the invention to the precise forms disclosed, obviously many modifications and variations are possible in view of the above teachings. The embodiments were chosen and described in order to best explain the principles of the invention and its practical applications, to thereby enable others skilled in the art to best utilize the invention and various embodiments with various modifications as are suited to the particular use contemplated. It is intended that the scope of the invention be defined by the following claims and their equivalents..

Contrary to the assertion in the final Action, the cited text of the '324 patent neither discloses nor suggests *uploading available resources and not-yet-approved entities to a management station, selecting a user identity and set of resources to be made available to the user, sending a list of selected resources to the resource provider, and allocating to the user the resources included in the list*, as recited in claims 8 and 15. To the contrary, the cited text appears entirely unrelated to the limitations recited in claims 8 and 15. Thus, the 324 patent, alone or in combination with the '336 patent, fails to disclose elements recited in claims 8 and 15. Accordingly, the final Action fails to establish a *prima facie* case of obviousness.

CONCLUSION

This application is in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the present application.

Should any issue remain that prevents immediate issuance of the

5 application, the Examiner is encouraged to contact the undersigned attorney to discuss the unresolved issue.

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